

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TYRONE WOOLASTON,

Defendant.

1:18-cr-00212 (RWS)

**DECLARATION OF BRIAN CALANDRA IN SUPPORT DEFENDANT TYRONE  
WOOLASTON'S MOTION TO COMPEL DISCOVERY**

BRIAN CALANDRA hereby declares as follows:

1. I am an associate at the law firm Shearman & Sterling LLP. I am counsel to Tyrone Woolaston in the above-captioned matter and am a member of the bar of this Court. I respectfully submit this declaration in support of Mr. Woolaston's Motion to Compel Discovery.
2. I am fully familiar with the discovery materials in this action and I base this declaration on my personal knowledge, upon inspection of said discovery materials, and conversations with others.
3. Attached as **Exhibit 1** to this declaration is a true and correct copy of the Discovery Letter sent by Chris LaVigne to Assistant United States Attorney Allison Moe, dated November 8, 2018. (Filed Under Seal).

4. Attached as **Exhibit 2** to this declaration is a true and correct copy of the Government's reply to the Discovery Letter sent by Assistant United States Attorney Thane Rhen, dated November 26, 2018. (Filed Under Seal).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 10, 2018  
New York, NY

  
Brian Calandra